

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Angela E. Barlow

Debtor

Bankruptcy No. 18-23759 CMB  
Chapter 13

Ronda J. Winnecour

Movant

Conciliation Date: 5/14/20 at 9 a.m.

vs.

Angela E. Barlow

Respondent

**DEBTOR'S RESPONSE TO CERTIFICATE OF DEFAULT**

Debtor Angela E. Barlow, by her counsel, Neighborhood Legal Services Association and Catherine T. Martin, in response to Movant's Certificate of Default respectfully states as follows:

1. The debtor's current mailing address is 309 N. Fairmount Street, Pittsburgh, PA 15206.
2. The debtor has fallen behind in her payments because her income decreased.  
  
Recently, she has been unable to work at all because she is under quarantine due to having been exposed to someone at her church who had become ill with the coronavirus.
3. The debtor plans to return to work as soon as she can, but has not been able to make a payment since the Trustee filed the certificate of default.

4. The debtor's plan has been confirmed, therefore debtor should be eligible for an extension of her plan beyond the five year limit under Section 1113(b) of the federal CARES Act which was signed into law March 27, 2020.

WHEREFORE, the Debtor requests that this Court excuse the failure to make a recent payment and permit the case to be considered at the Conciliation conference scheduled for May 14, 2020.

RESPECTFULLY SUBMITTED:

/s/ Catherine T. Martin  
Attorney for the Debtor

PA Bar I.D. 29049

Neighborhood Legal Services Association

928 Penn Avenue

Pittsburgh, PA 15222

412-586-6118

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**CERTIFICATE OF SERVICE**

I, Catherine T. Martin, certify under penalty of perjury that on March 30, 2020, I served a copy of the within Debtor's Response on all parties as listed below:

**The following parties were served by electronic delivery:**

Office of the United States Trustee  
ustpreion03.pi.ecf@usdoj.gov

Ronda J. Winnecour  
cmecf@chapter13trusteewdpa.com

EXECUTED ON: 3/30/20

RESPECTFULLY SUBMITTED:

/s/ Catherine T. Martin  
Attorney for the Debtor

PA Bar I.D. 29049

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928 Penn Avenue

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